

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

**DECLARATION OF BENJAMIN S. BELLER IN SUPPORT OF  
THE OBJECTION OF THE FTX RECOVERY TRUST TO THE AMENDED PROOF OF  
CLAIM FILED BY THE JOINT LIQUIDATORS OF THREE ARROWS CAPITAL LTD.**

I, Benjamin S. Beller, hereby declare under penalty of perjury:

1. I am a member in good standing of the Bar of the State of New York and have been admitted *pro hac vice* to practice before this Court. I am a partner of Sullivan & Cromwell LLP and am one of the attorneys representing the FTX Recovery Trust in the above-captioned proceedings. I submit this declaration in support of the *Objection of the FTX Recovery Trust to the Amended Proof of Claim Filed by the Joint Liquidators of Three Arrows Capital Ltd.* (including all exhibits and schedules thereto, the “Objection”), filed concurrently herewith, to place before the Court certain documents referenced in the Objection.<sup>2</sup>

2. Attached hereto as Exhibit A is a true and correct copy of a screenshot of a post by Kyle Davies (@KyleLDavies) dated December 9, 2022, which was accessed from X

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063, respectively. Due to the large number of post-effective date debtor entities in these chapter 11 cases, a complete list of the post-effective date debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the FTX Recovery Trust’s claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Objection.

(formerly known as Twitter) at <https://x.com/KyleLDavies/status/1601140724984033280> on December 3, 2024.

3. Attached hereto as Exhibit B is a true and correct copy of a group chat between former employees of FTX and 3AC bearing production numbers Tackett\_3AC\_000000158 through Tackett\_3AC\_000000227, which was received from Zane Tackett and produced by the FTX Recovery Trust to the Joint Liquidators.

4. Attached hereto as Exhibit C is a true and correct copy of a June 14, 2022 Slack conversation between Zane Tackett and Sam Bankman-Fried bearing production numbers FTX\_3AC\_0000001594 through FTX\_3AC\_0000001596, which was produced by the Debtors to the Joint Liquidators.

5. Attached hereto as Exhibit D is a true and correct copy of a June 14, 2022 email from Zane Tackett to Kyle Davies bearing production number FTX\_3AC\_0000000764, which was produced by the Debtors to the Joint Liquidators.

Dated: June 20, 2025

/s/ Benjamin S. Beller  
Benjamin S. Beller